

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-cr-20287

UNITED STATES OF AMERICA,
Plaintiff,

vs.

DIORI BARNARD,
Defendant.

UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL

COMES NOW the Defendant, Diori Barnard, by and through undersigned counsel, and respectfully requests this honorable Court to continue trial, and as grounds therefore would state the following:

1. The Defendant was arraigned on July 15, 2024.
2. Calendar Call is scheduled for November 27, 2024. Trial is scheduled during the two week trial period commencing on December 02, 2024.
3. Defense counsel is in the process of researching and drafting a Motion to Suppress, and requires additional time to file the same.
4. Additionally, during the week of December 02, 2024, defense counsel is scheduled to be in a specially set trial which is expected to last four to five days.
5. Finally, Calendar Call and Trial will be impacted by counsel's unavailability due to Thanksgiving and travel for winter holidays.
6. The Defendant therefore requests a continuance of sixty (60) days.
7. Counsel has discussed this request with Assistant United States Attorney Abbie Waxman Esq., who has no objection to this request.
8. Counsel has discussed this request with the Defendant, who agrees to the request and waives his right to speedy trial up to and including February 14, 2025.

WHEREFORE, Defendant, Diori Barnard, respectfully requests this honorable Court enter an order granting the Defendant's Motion for Continuance.

/s/ Juan E. Mourin, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2024, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to Assistant United State Attorney.

/s/ Juan E. Mourin, Esq.

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